

**REMARKS**

The Examiner is thanked for the careful examination of the application. However, in view of the foregoing amendments and remarks that follow, the Examiner is respectfully requested to reconsider the present application.

In response to the rejections made by the Examiner, the pending claims 1-15 have been cancelled, and new claims 16-26 are submitted. Claims 16, 22, 24 and 26 are independent claims.

In the outstanding Office Action, claims 1-5, 13 and 14 have been rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 5,390,003, hereinafter *Yamaguchi*. Claims 6, 8-11, and 15 have been rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamaguchi* in view of U.S. Patent No. 5,309,524, hereinafter *Hirabayashi*. And, claims 7 and 12 have been rejected under 35 U.S.C. §103(a) as being unpatentable over *Yamaguchi* in view of U.S. Patent No. 5,671,277, hereinafter *Ikenoue*.

*Yamaguchi* functions to detect an improper device being copied, such as a bill, by first looking in a preliminary decision for a pattern, such as a circular pattern. See column 11, lines 53-56, and Figure 10. If the circular pattern is not detected, it is decided that the object is not a bill and a normal copying operation is carried out. See column 11, lines 63-66. However, if it is decided that the preliminary pattern, such as a circular pattern is present, a main decision is made according to the teaching set forth at column 12 lines 20 *et seq.*

The new claims 16-26 have been carefully prepared to distinguish over the prior art of record. Specifically, Applicant submits with regard to claim 16 that *Yamaguchi* does

not teach or suggest the claimed combination that includes, among other elements, a plurality of filters provided for image detection, and extractor as defined in claim 16, and a calculated as defined in claim 16. With regard to claim 24, Applicant submits that *Yamaguchi* does not teach or suggest the claimed combination which includes, among other elements, a binarizer which binarizes input image data to provide bi-level image data, a storage device which stores the bi-level image data obtained by the binarizer, a partial image extractor which extracts specified partial images in the bi-level image stored in the storage device with a filter for conversion; a gain calculator as defined in claim 24, a position calculator which calculates ideal positions of the partial images to be included in a specified pattern, and a gain output device which outputs a gain on the ideal positions based on the information obtained by the gain calculator. With regard to claim 26, Applicant submits that *Yamaguchi* does not teach or suggest the claimed combination which includes, among other elements, binarizing the input image data, storing the bi-level image data, extracting specified partial images in the bi-level image stored with a filter for conversion, and calculating and outputting, as defined in claim 26.

The remaining claims are dependent claims which depend from various ones of the independent claims.

If the Examiner is of the opinion that *Yamaguchi* still teaches or suggests any of the now pending claims, the Examiner is respectfully requested to identify, with specificity, where *Yamaguchi* discloses each and every one of the claim elements.

The Examiner has relied upon *Hirabayashi* as allegedly disclosing an image reducing apparatus for obtaining a reduced image in the process of detecting special

patterns comprising a resolution converter which converts the bi-level data of the special pattern image to bi-level data of a lower resolution. In addition, the Examiner has relied upon *Ikenoue* for allegedly teaching an image forming apparatus and copy management system that comprises a map generator which converts the bi-level data to multilevel data according to distances from the position of the partial image and generates a map data of the multilevel data. Applicant submits that those teachings do not overcome the deficiencies of *Yamaguchi* with respect to the new claims.

Furthermore, Applicant reserves the right to challenge the Examiner's interpretation of the teachings of *Yamaguchi*, *Hirabayashi*, and *Ikenoue*, as set forth in the outstanding Official Action, and the Examiner's motivations for combining such references, at a later time if necessary and appropriate.

Accordingly, in view of the foregoing amendments and remarks, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

In the event that there are any questions concerning this response, the Examiner is respectfully urged to telephone the undersigned attorney so that prosecution of the application may be expedited.

Respectfully submitted,

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